



Information Disclosure Policy

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Pinthong Industrial Park Public Company Limited

Revision No.1

Approved on 23 February 2024, (BOD1/2024)

## **Information Disclosure Policy**

Pinthong Industrial Park Public Company Limited (the “Company”) and its subsidiaries recognize the importance of conducting business in accordance with the principles of good corporate governance and information disclosure, by adhering to the principles of accurate, complete, transparent, consistent, and timely disclosure of information and data, in accordance with good corporate governance practices on a continuous basis, in order to ensure that shareholders, investors, the public, and all stakeholders have confidence that the Company’s disclosure of information is conducted on an equitable basis.

The Board of Directors has therefore established the Information Disclosure Policy to serve as guidelines for directors, executives, employees, and authorized spokespersons (Spokespersons).

### **1. Information Disclosure Policy**

The disclosure of information and data shall be in accordance with the following policy:

#### **1.1 Disclosure of Material Non-public Information**

The Company shall disclose information with due care, ensuring accuracy, completeness, and timeliness, and shall comply with applicable laws, rules, regulations, conditions, and procedures relating to information disclosure. Material information to be disclosed to the public by the Investor Relations function must be reviewed and overseen by the Board of Directors to ensure the accuracy of information released by the Company and to ensure that shareholders and other stakeholders, such as investors and analysts, receive sufficient and equitable information.

#### **1.2 Disclosure of Material Public Information**

The disclosure of the Company’s information and data forms part of good corporate governance principles, ensuring accurate and complete disclosure without causing confusion. The Company shall establish a disclosure system to ensure that material information is disclosed in a transparent, clear, accurate, timely, consistent,

and up-to-date manner, and is sufficient for investment decision-making, without causing misunderstanding of the disclosed information or its substance.

### 1.3 Disclosure of Non-Material Information

The Company shall disclose information based on factual accuracy and without intent to mislead others regarding the Company's financial position, operating results, or securities price, or in a manner that may cause others to misunderstand that the securities price may increase or decrease.

### 1.4 Disclosure of Forward-Looking Information

The Company shall disclose forward-looking information regarding business direction and future performance with due care, and shall clearly state the assumptions and conditions underlying such projections.

1.5 The disclosure of information and data shall be conducted fairly and equitably to all stakeholders, including investors, analysts, financial institutions, and the media.

1.6 The Company shall recognize the necessity of maintaining the confidentiality of business-sensitive information.

1.7 Non-compliance with this policy shall be deemed a violation of the Company's Code of Conduct.

## 2. Scope

2.1 This policy shall apply to all directors, executives, and employees of the Company, including persons who are authorized to access and use information assets under the Company's supervision and control.

2.2 This policy shall cover all forms of communication, including meetings, press conferences, interviews, live broadcasts, participation in programs, the Company's website, various social network platforms, as well as verbal communications such as telephone conversations with shareholders, investors, analysts, financial institutions, and the media.

This policy shall also cover the disclosure of information and data submitted to the Stock Exchange of Thailand, including both financial and non-financial information, operating results or projections (such as revenue and expense forecasts), assets, liabilities, liquidity, financial position and operating results (MD&A), annual reports, press releases, letters to shareholders, documents or presentation materials by senior executives, as well as information and data disclosed on the Company's or group's website or disseminated through social network platforms.

Exceptions shall apply to disclosures related to general public relations activities, such as the dissemination of company brochures (Company Profile), company news, corporate social responsibility and environmental activities (CSR & Activities), annual reports, sustainability reports (SD Report), or other similar activities, as these are considered part of normal business-supporting activities.

### **3. Designation of Persons and Roles Responsible for the Disclosure of Material Information**

#### **3.1 Authorized Persons for Disclosure of Material Information (Spokespersons)**

Persons authorized to respond to inquiries or disclose material information of the Company to the public shall include:

(1) The Board of Directors, which shall have the highest authority to determine whether to disclose or not disclose the Company's information and data, and shall supervise and monitor the implementation of this policy to ensure that the Company complies with the disclosure principles prescribed herein.

(2) The Chief Executive Officer, Managing Director, and/or persons authorized by the Board of Directors, who shall have the authority to determine whether to disclose or not disclose the Company's information and data, and shall supervise and monitor the implementation of this policy, including providing knowledge and guidance to directors and employees regarding the Company's information disclosure policy.

(3) The Chief Financial Officer, the Director of Strategy and Corporate Governance, the Chief Marketing Officer, and the Company Secretary, who shall be responsible for supporting

functions related to the disclosure of the Company's information and data and/or other assigned duties, to the Chief Executive Officer, in order to ensure that the dissemination of information and data to all stakeholders, including investors, analysts, financial institutions, and the media, is accurate, complete, sufficient, consistent, and timely, and to ensure compliance with this policy.

(4) The Chief Executive Officer, the Chief Financial Officer, the Director of Strategy and Corporate Governance, and other authorized persons designated by the Chief Executive Officer shall act as authorized spokespersons (Spokespersons) to communicate the Company's information and data to all stakeholders, including investors, analysts, financial institutions, and the media.

(5) The Chief Executive Officer, the Chief Financial Officer, and the Company Secretary shall be responsible for submitting information and data required to be disclosed in accordance with applicable laws and regulations to the Stock Exchange of Thailand and/or the Securities and Exchange Commission, such as financial statements, Management Discussion and Analysis (MD&A), annual reports, establishment of subsidiaries, joint ventures, issuance of debentures, and other relevant matters.

(6) Persons authorized by those specified in items (1)–(4), solely within the scope of the assigned matters.

### **3.2 Units Responsible for Controlling Disclosure of Material Information**

The units responsible for controlling and reviewing the content of the Company's disclosure of material information to external parties shall include:

(1) The Marketing and Customer Relations Department, responsible for disseminating and communicating material information to investors, analysts, and the media

(2) The Company Secretariat Office and the Accounting and Finance Department, responsible for disclosing material information to the Stock Exchange of Thailand, foreign stock exchanges, and relevant regulatory authorities

(3) The Investor Relations Department, responsible for providing material information to analysts or securities companies

(4) Other units as assigned by the Chief Executive Officer, the Director of Strategy and Corporate Governance, the Chief Marketing Officer, and the Chief Financial Officer, solely within the scope of assigned duties

### **3.3 Employees of the Company**

The Company Secretariat shall promote awareness and foster a corporate culture among employees regarding the disclosure of material information, ensuring that such disclosure is conducted transparently, truthfully, and with due consideration to the Company's reputation. The Company shall provide communication and clarification to employees to ensure awareness of the impact of disclosing material information. Employees involved in disclosure shall disclose only information that has already been publicly disclosed, and only to the extent of such disclosure.

## **4. Guidelines for Disclosure of Material Information and Data**

### **4.1 Definition of Material Information and Data**

Material information and data shall mean any information relating to the Company's business operations and information used in information systems that is material to changes in the price or value of securities or investment decisions. Disclosure of such information by inappropriate means may have a material impact on the Company's business operations, securities price, shareholders' interests, or investors' decision-making.

In general, material information that may affect investors' decisions includes, but is not limited to, the following:

- Financial statements, including assets, liabilities, operating results, statement of financial position, statement of profit or loss, statement of cash flows, statement of changes in shareholders' equity, notes to the financial statements, and significant changes in accounting policies
- Information relating to mergers, acquisitions or disposals of associates or subsidiaries that may significantly affect or change the Company's business structure
- Information relating to acquisitions or disposals of securities or investment projects of significant value

- Information relating to dividend payment or omission of dividend payment, or changes in the Company's dividend policy
- Information relating to changes in major shareholders, controlling persons, or key executives
- Information relating to significant legal disputes of the Company
- Information relating to the Company's policies or business strategies
- Information relating to the Company's operations, business direction, including future operating results
- Developments or future investment projects
- Any other information relating to the Company that may affect the securities price or influence investment decisions

This shall also include information that the Stock Exchange of Thailand requires the Company to disclose to investors.

#### **4.2 Communication Channels for Information and Data Disclosure**

The Company requires that disclosure of operating results by reporting periods and significant events be conducted in accordance with the rules and regulations of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET), in order to ensure effective disclosure and equal access by stakeholders. In this regard, the Company shall disclose and regularly update information through the following channels:

- 1) Disclosure via the electronic reporting system of the Stock Exchange of Thailand ([www.set.or.th](http://www.set.or.th)) or relevant regulatory authorities
- 2) Reporting to the SEC through statutory filings, including the annual report, Form 56-1, and other reports or clarifications as requested (if any)
- 3) The Company's website: [www.pinhongindustrial.com](http://www.pinhongindustrial.com)
- 4) Public media, including newspapers, magazines, articles, television, radio, and printed materials, as well as social network platforms of the Company group, such as Facebook and Line
- 5) Providing information to investors, analysts, financial institutions, and the media during site visits and meetings with management
- 6) Roadshows and presentations to investors both domestically and internationally

- 7) Investor relations activities, such as Opportunity Day
- 8) Distribution of notices of shareholders' meetings and related documents via the Company's website and by post

#### **4.3 Disclosure of Information and Data to the Stock Exchange of Thailand and the Public**

- 1) The Company shall not disclose material information that may affect changes in securities prices to the public until such information has been reported to and acknowledged by the Stock Exchange of Thailand. Such information shall also be posted on the Company's website in accordance with this policy.
- 2) The Company Secretary shall be responsible for notifying the Board of Directors of information and data disclosed to the Stock Exchange of Thailand.

#### **4.4 Timing of Disclosure**

- 1) Periodic disclosure in accordance with statutory reporting requirements to regulatory authorities
- 2) Event-based disclosure in accordance with the requirements of the Stock Exchange of Thailand or relevant regulatory authorities
- 3) Disclosure to investors and securities analysts, such as participation in meetings organized by external parties both domestically and internationally, including listed company activities such as Opportunity Day, as deemed appropriate

#### **4.5 Quiet Period**

The Company shall impose a quiet period of thirty (30) days prior to the announcement of operating results until the date such results are disclosed to the Stock Exchange of Thailand, in order to avoid unequal disclosure of information which may lead to the use of insider information or stock price manipulation. During the quiet period, the Company shall refrain from responding to any inquiries regarding the forthcoming operating results and shall not provide any comments on performance outlook, including refraining from arranging meetings or responding to

inquiries via telephone with analysts, investors, or the media, except for the disclosure of factual information that has already been publicly disclosed.

#### **4.6 Blackout Period for Securities Trading and Restricted Persons**

For the purpose of good corporate governance, directors, the top four executives as defined by the Securities and Exchange Commission, and related persons (spouses or cohabiting partners and children of directors and executives), as well as employees in functions with access to financial statements and/or material non-public information of the Company that may affect changes in securities prices, such as the Company Secretariat, Accounting and Finance, Investor Relations, and Marketing and Corporate Communications, shall be prohibited from trading, transferring, or causing others to trade or transfer securities issued by the Company prior to the public disclosure of financial or material information, for a period of thirty (30) days prior to the announcement of operating results or disclosure of material information affecting securities prices. The Company shall announce such blackout periods accordingly.

#### **4.7 Handling of Market Rumors or False Markets**

- 1) The Company has a policy not to comment on market rumors or abnormal securities trading, particularly where it is evident that the Company is not the source of such rumors.
- 2) However, the Company may provide clarification regarding market rumors or abnormal securities trading under certain circumstances, such as upon request by the Stock Exchange of Thailand or where the Company deems it appropriate.

#### **4.8 Trading Halts**

- 1) In the event that the Company is in the process of preparing to disclose material information and data, the Company may need to request a temporary suspension of trading of its securities from the Stock Exchange of Thailand, in order to ensure that disclosure to investors is conducted on an equitable basis.

2) The Chief Executive Officer shall have the authority to decide on requesting a temporary trading halt, unless such authority is delegated to a person authorized by the Chief Executive Officer.

## **5. Confidentiality of Information**

In order to prevent leakage of internal information, the Company has defined the categories of persons who may have access to inside information as follows:

- 1) The Board of Directors and sub-committees
- 2) Authorized spokespersons (Spokespersons)
- 3) Personnel responsible for Accounting and Finance and Investor Relations (Corporate Accounting & Finance & IR), who are responsible for supporting or preparing the Company's material information and data
- 4) Personnel responsible for Accounting and Finance (Accounting & Finance), who are responsible for supporting or preparing the Company's material information and data
- 5) Personnel responsible for Corporate Strategy and Compliance (Corporate Strategy & Compliance), who are responsible for supporting or preparing the Company's material information and data

Directors, executives, and employees who have access to the Company's material information shall not disclose or use such inside information obtained through their duties or from other persons for personal benefit or for the benefit of others, and shall have the duty to maintain the confidentiality of such information and prevent any leakage or disclosure to unauthorized persons, which may cause damage to the Company and its stakeholders.

In cases where disclosure is required by law or due to business necessity, such as disclosure to external auditors, legal advisors, or other consultants, the Company shall enter into confidentiality agreements with such persons.

## **6. Monitoring and Promotion of the Information Disclosure Policy**

The Company Secretariat and the Investor Relations Department shall be responsible for monitoring and reviewing this policy and related procedures on an annual

basis, and reporting the results to the Board of Directors. They shall also coordinate with the Human Resources Department to organize training programs to ensure that directors, executives, and employees of the Company are informed of and recognize their responsibilities in relation to the disclosure of the Company's information and data in accordance with this policy in an accurate and appropriate manner.

#### **7. Procedures in Case of Doubt or Uncertainty**

In complying with this Information Disclosure Policy, the Company's Corporate Governance Policy shall be taken into consideration. In case of any doubt, inquiries shall be made to the immediate supervisor or relevant departments, such as the Marketing and Corporate Communications Department, the Investor Relations Department, or the Company Secretariat.

This Information Disclosure Policy shall be effective from 23 February 2024, by the approval of the Board of Directors at its Meeting No. 1/2024.

- Mr. Prasan Tanprasert -

Chairman of the Board of Directors

Pinthong Industrial Park Public Company Limited